

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 MICHAEL G. PITMAN (DCBN 484164)
Assistant United States Attorney
5 150 Almaden Boulevard, Suite 900
San Jose, California 95113
6 Telephone: (408) 535-5040
Facsimile: (408) 535-5081
7 michael.pitman@usdoj.gov

8 COREY J. SMITH (MABN 553615)
Senior Litigation Counsel
9 LEE F. LANGSTON (NYBN 4910311)
CHRISTOPHER M. MAGNANI (Maryland)
10 Trial Attorneys
United States Department of Justice, Tax Division
11 Attorneys for the United States of America
12

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 ROBERT T. BROCKMAN,
20 Defendant.
21

Case No.: 3:20-cr-00371-WHA
UNITED STATES' STATUS
CONFERENCE STATEMENT
Date: November 17, 2020
Time: 2:00 PM

22 The United States of America hereby respectfully provides the following statement in
23 anticipation of the status conference currently scheduled for November 17, 2020:

24 On October 1, 2020, a federal grand jury in the Northern District of California returned an
25 Indictment charging the Defendant with: conspiracy to defraud the United States, in violation of 18
26 U.S.C. § 371; tax evasion, in violation of 26 U.S.C. § 7201; FBAR reporting violations, in violation of
27 31 U.S.C. §§ 5314 and 5322; wire fraud, in violation of 18 U.S.C. § 1343; money laundering, in
28 violation of 18 U.S.C. §§ 1956(a)(1)(A)(ii), (a)(1)(B)(i), and (a)(2)(B)(i); evidence tampering, in

1 violation of 18 U.S.C. § 1512(b)(2)(B); and destruction of evidence, in violation of 18 U.S.C.
2 1512(c)(1).

3 The Defendant made his initial appearance before the Honorable Nathanael M. Cousins on
4 October 15, and entered not guilty pleas to all counts. Time was excluded under the Speedy Trial Act
5 from October 15, 2020 through November 17, 2020.

6 The government has received a discovery request pursuant to Fed. R. Crim. P. 16, but has yet to
7 begin producing discovery. It is the government's position that protective orders will be required to
8 protect multiple different categories of discovery to be produced. The government and defense counsel
9 have met a conferred regarding a general protective order designed to cover the majority of the
10 discovery, and are currently negotiating in an effort to formulate a stipulated protective order for the
11 Court's review.

12 The government and defense counsel have also met a conferred regarding a proposed scheduling
13 order for this case, and are currently negotiating in an effort to formulate a stipulated scheduling order
14 for the Court's review.

15 Additionally, the government respectfully provides notice to the Court that Defendant's counsel
16 have indicated that they expect to request a determination under 18 U.S.C. § 4241 whether Defendant is
17 mentally competent to stand trial in this matter.

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19 Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

20 Date: November 9, 2020

/s/Corey J. Smith
Senior Litigation Counsel
MICHAEL G. PITMAN
Assistant United States Attorney

23 Attorneys for United States of America
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CERTIFICATE OF SERVICE

It is hereby certified that service of the foregoing UNITED STATES' STATUS
CONFERENCE STATEMENT has been made this day through the Court's ECF system to
Defendant's attorneys of record.

Date: November 9, 2020

s/ Corey J. Smith
Senior Litigation Counsel
United States Department of Justice,
Tax Division
Corey.Smith@usdoj.gov
(202)514-5230